

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN IBARRA,

Plaintiff,

v.

CITY OF CHICAGO, a municipal  
corporation, *et al.*,

Defendants.

Case No. 10 CV 4450

Honorable Ruben Castillo

**PLAINTIFF'S MOTION FOR PROTECTIVE ORDER**

Plaintiff, JOHN IBARRA, through his undersigned counsel, respectfully moves this Court to enter a protective order, attached hereto as Exhibit 1, in this matter. In support, Plaintiff Ibarra states as follows:

1. During discovery in this matter, Plaintiff has requested discovery including personnel files of the individual Defendant Chicago Police Officers and CR Files, which may include confidential information, such as salary and/or compensation information and personal identifying information, and information that may be protected by the Health Insurance Portability and Accountability Act of 1996, 42 U.S.C. § 201 *et seq.*

2. Defendants have represented that they will not produce the requested documents without a protective order. Accordingly, Plaintiff has attached a protective order to prevent unnecessary dissemination or disclosure of such confidential information. (*See* Exhibit 1, Proposed Protective Order.)

3. On January 25, 2012, Plaintiffs' counsel sent Defendants' counsel for the City

Defendants a revised proposed protective order. To date, Defendants' counsel has not responded with any additional revisions.

4. Discovery is currently being taken and Plaintiff requires the documents to complete the depositions of the individual Defendants and to complete discovery in this case. Therefore, Plaintiff seeks entry of the attached protective order so that the necessary documents can be produced by the City.

WHEREFORE, for the above stated reasons, Plaintiff Ibarra respectfully requests that this Court enter a protective order, attached hereto as Exhibit 1, and for other such relief as justice requires.

Respectfully Submitted,

JOHN IBARRA

*s/Dana L. Kurtz*

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One of Plaintiff's Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies and states that the attached documents were served on the designated attorneys by electronic service via the Court's ECF System on this 6th day of February 2012.

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*s/Dana L. Kurtz*

*Electronically filed on February 6, 2012*